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UNITED STATES DISTRICT COURT  
 NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,	)	Criminal Case No. 05-00008
	)	
Plaintiff,	)	
	)	
v.	)	GOVERNMENT'S MOTION FOR
	)	SUBSTANTIAL ASSISTANCE
	)	DEPARTURE UNDER U.S.S.G. § 5K1.1
LIU, YA JUN,	)	AND 18 U.S.C. § 3553(e)
a/k/a, "CAndace,"	)	
	)	
Defendant.	)	
_____	)	

COMES NOW the plaintiff, UNITED STATES OF AMERICA, by and through its counsel, Leonardo M. Rapadas, United States Attorney, and Timothy E. Moran, Assistant United States Attorney, and hereby moves the Court, pursuant to United States Sentencing Guidelines § 5K1.1 and 18 U.S.C. § 3553(e), to depart from the Sentencing Guidelines and the statutory mandatory minimum consecutive sentence, based on the defendant's substantial assistance to the Government. The Government also moves for a one-level reduction under U.S.S.G. § 3E1.1(b). The Government recommends that the Court depart downward to advisory Guidelines **level 15**.

The Government intends to make its specific recommendation at the sentencing hearing.

LEONARDO M. RAPADAS  
 United States Attorney  
 Districts of Guam and the NMI

Date: September 7, 2006

By: /s/  
 TIMOTHY E. MORAN  
 Assistant United States Attorney